

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

)

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v.

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)

CHRISTOPHER LLOYD TAYLOR,

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)

Defendant.

)

Case No. 5:23-MJ-155 (ATB)

U.S. DISTRICT COURT - N.D. OF N.Y.

FILED

Mar 16 - 2023

John M. Domurad, Clerk

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about March 16, 2023, in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section

26 U.S.C. §§ 5841, 5845(a)(3), 5861(d),
5871

Offense Description

Possession of a Firearm (Rifle with Barrel Less than 16 inches in Length) Not Registered in National Firearms Registration and Transfer Record

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



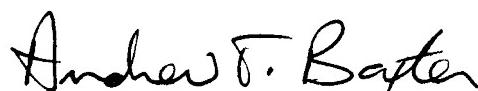
Complainant's signature

Michael Renn, FBI Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 3/16/2023



Judge's signature

City and State: Syracuse, New York

Hon. Andrew T. Baxter, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, **Michael Renn**, being duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the FBI and have been so since 2017. I am currently assigned to the Joint Terrorism Task Force (“JTTF”) where my primary responsibility is conducting national security investigations involving matters of international and domestic terrorism. Prior to employment with the FBI, I was employed as a United States Border Patrol Agent from 2011 to 2017. Throughout my employment as a federal law enforcement officer, I have received extensive training and I have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, examination of digital and physical evidence, and various other criminal laws and procedures. I have been afforded the opportunity to work on a significant number of criminal investigations, including cases involving firearms and explosives.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Section 2516, Title 18, United States Code.

3. This affidavit is founded on my personal knowledge based on my participation in this investigation, including the review of reports by myself and/or other law enforcement agents, communication with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts known to me regarding this investigation.

4. I submit this affidavit in support of a criminal complaint charging CHRISTOPHER LLOYD TAYLOR with a violation of Title 26 U.S.C. §§ 5841, 5861(d), 5871 [Possession of an Unregistered Firearm].

Applicable Law as to Alleged Offense

5. Title 26, United States Code, Section 5861 provides, in pertinent part, that, “It shall be unlawful for any person--... (d) to receive or possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record...”

6. Title 26, United States Code, Section 5845(a) defines the term “firearm” to purposes of Chapter 53 of Title 26, to include “a rifle having a barrel or barrels of less than 16 inches in length” and “a weapon made from a rifle if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 16 inches in length.” This includes weapons that are readily restored to firing condition.

7. According to Title 26, United States Code, Section 5845(b), a “rifle” means a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder and designed or redesigned and made or remade to use the energy of the explosive in a fixed cartridge to fire only a single projectile through a rifled bore for each single pull of the trigger, and shall include any such weapon which may be readily restored to fire a fixed cartridge.”

8. In order to legally possess a rifle with a barrel less than 16 inches in length (a “Short-Barreled Rifle” or “SBR”) in the United States, the Short-Barreled Rifle would have to be registered through ATF in the National Firearms Registration and Transfer Record (NFRTR) and the purchase made through an individual with a valid FFL (Federal Firearms License).

9. A violation of Title 26 U.S.C. § 5861(d) for possession of an unregistered firearm, such as a Short-Barreled Rifle, involves the following elements: (1) the defendant possessed a

“firearm” as defined in the National Firearms Act, 26 U.S.C. § 5845; (2) the defendant knew he possessed the firearm; (3) the firearm was or could have readily been put into operating condition; and (4) that the firearm was not registered to the defendant in the National Firearms Registration and Transfer Record.

BASIS FOR PROBABLE CAUSE

10. On March 10, 2023, the Honorable Andrew T. Baxter, a U.S. Magistrate Judge in the U.S. District Court for the Northern District of New York, issued a search warrant (the “Warrant”) for the property located at 304 Wilson Street, Syracuse, New York 13203 (the “Premises”), the person of Christopher Taylor, and a 2017 Chevrolet Equinox. The Warrant authorized the seizure of, among other items, any firearms and ammunition.

11. In executing the Warrant on March 16, 2023, law enforcement searched the Premises and found a short-barreled AR-15-style rifle (the “Firearm”) in a gray duffel bag on the floor in the closet of the master bedroom of the Premises. Inside the duffel bag, law enforcement found an upper and lower receiver: the upper receiver of the Firearm was a black metal barrel with a black tactical-style flashlight with no manufacturer’s marking or serial numbers; the upper receiver had a barrel that was measured to be 12.875 inches from the end of the flash suppressor to closed breech face, and therefore had a barrel less than 16 inches in length. The lower receiver of the Firearm was stamped with the manufacturer’s name “Spikes Tactical” and labeled with Model Number ST15 with Serial Number SHM008427. Also contained in the duffel bag were several metal rifle magazines.

12. Photos of the firearms are displayed below, which show the measurement of the barrel length and the upper and lower receivers:



13. Based on my training and experience and after consultation with experts from the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), the upper and lower receivers of the Firearm could be readily restored to firing condition by securing the upper and lower assemblies with two takedown pins and could be assembled to firing condition within a minute.

14. On March 8, 2023, a query through ATF records confirmed that TAYLOR does not have any firearms, including a Short-Barreled Rifle such as the Firearm, registered in the National Firearms Registration and Transfer Record (NFRTR).

15. On March 16, 2023, TAYLOR was interviewed by the FBI and ATF at the FBI office in Syracuse, New York. That interview was audio and video recorded. While at the FBI office and after waiving his Miranda rights, TAYLOR acknowledged that he owned an approximately 11.5-inch barrel upper receiver, which he told investigators was in a bag in a closet in the master bedroom at the Premises. Furthermore, TAYLOR stated that he readily and often interchanged the upper and lower assemblies of the rifles that he owned and admitted that he had shot the Firearm in that configuration. TAYLOR also stated that he had purchased the upper receiver containing the 11.5-inch barrel from Palmetto State Armory, an online firearm and firearm parts retailer based in South Carolina.

16. Records from Palmetto State Armory show that on or about March 19, 2020, TAYLOR purchased the following items, which included an AR-15 upper receiver with a 11.5-inch short-barrel described as a “pistol kit”:

Item	UPC Code	Quantity Or...	Units	Description	Unit Price	Amount	Options
5165491370	5165491370	1	Ea	PSA 11.5" 5.56 NATO 1:7 Nitride 10.5" Lightweight M-Lok MOE EPT SBA3 Pistol Kit	479.99	479.99	
5842	648018090073	2	Ea	Blackhawk! Serpa Sportster Holster (Glock 19/23/32/36)- 413502BK-R	30.98	61.96	
516446780	516446780	1	Ea	PSA 16" 5.56 NATO 1:7 Midlength Nitride 13.5" Lightweight M-Lok MOE EPT Rifle Kit w/ MBUS Sight Set	479.99	479.99	
116076	810029209533	2	Ea	PSA Custom 2-Point Bungee Sling, Black - 116076	12.95	25.90	
sales-tax-ma..		1	Ea	Sales tax	87.24	87.24	
						Subtotal	1,135.08
						Shipping Cost (UPS® Ground)	42.50
						Total	\$1,177.58

17. Based on my training and experience, I know that such pistol kits sold by Palmetto State Armory are readily interchangeable and often purchased and used to assemble short-barreled

rifles (SBRs), meaning the weapon was designed or redesigned, and intended to be fired from the shoulder (as more fully defined in 26 U.S.C. 5845(c)).

CONCLUSION

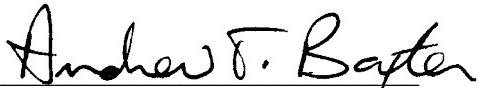
18. Based on the foregoing, your affiant submits that there is probable cause to conclude that on March 16, 2023, in Onondaga County, New York, Christopher Lloyd TAYLOR violated Title 26, United States Code, Sections 5841, 5861(d), and 5871 for possessing a firearm that was not registered to him in the National Firearm Registration and Transfer Record.

Attested to by the affiant,



Michael Renn
Special Agent
Federal Bureau of Investigation (FBI)

I, the Honorable Andrew T. Baxter, United States Magistrate Judge, hereby acknowledges that this affidavit was attested by the affiant by telephone on March 16, 2023, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure:



Hon. Andrew T. Baxter
United States Magistrate Judge